UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
Case No. 3:10cv311-MOC-DCK

VENUS SPRINGS,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	**MOTION FOR PROTECTIVE ORDER**
ALLY FINANCIAL, INC. f/k/a	)	
GMAC INC., AMY BOUQUE,	)	
KATHLEEN PATTERSON,	)	
YEQUIANG HE and CYNTHIA	)	
DAUTRICH,	)	
	)	
Defendants.	)	

NOW COME Defendants Ally Financial, Inc., and Amy Bouque and move this Court pursuant to Rule 26(c) of the Federal Rules of Civil Procedure for a protective order requiring that video footage from the Rule 30(b)(6) deposition provided by Ally Financial, Inc., in this case may be used only for the purposes of this action, and specifically cannot be used by Plaintiff on her YouTube site. Defendants request that Court either modify the existing protective order regarding the deposition [Dkt. 55] or enter a new protective order. The grounds for this motion are set forth in the supporting memorandum filed herewith. Defendants certify that they have in good faith attempted to confer with Plaintiff in an effort to resolve the dispute without court action.

This the 24th day of September, 2014.

                               Respectfully submitted,

                               /s/ Clifton L. Brinson
                               Kirk G. Warner
                               N.C. State Bar No. 16238
                               Clifton L. Brinson
                               N.C. State Bar No. 34331
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CERTIFICATE OF SERVICE

I hereby certify that on September 24, 2014, I electronically filed the foregoing

MOTION FOR PROTECTICE ORDER with the Clerk of Court using the CM/ECF system,

which will send notification of such to the CM/ECF participants.

/s/ Clifton L. Brinson
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